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PIONEER NATURAL RESOURCES COMPANY

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA**

WESTERN CAB COMPANY, Individually
and on Behalf of All Others Similarly
Situated,

Plaintiff,

v.

PERMIAN RESOURCES CORP. f/k/a
CENTENNIAL RESOURCE
DEVELOPMENT, INC.; CHESAPEAKE
ENERGY CORPORATION;
CONTINENTAL RESOURCES INC.;
DIAMONDBACK ENERGY, INC.; EOG
RESOURCES, INC.; HESS
CORPORATION; OCCIDENTAL
PETROLEUM CORPORATION; and
PIONEER NATURAL RESOURCES
COMPANY,

Defendants.

CASE NO. 2:24-cv-00401-GMN-MDC

**STIPULATION AND ORDER TO
SUSPEND DEADLINE FOR
DEFENDANTS TO RESPOND TO THE
COMPLAINT**

(FIRST REQUEST)

Pursuant to Local Rules 7-1 and IA 6-1, Plaintiff Western Cab Company (“Western Cab”), and all Defendants in this action, Permian Resources Corp. f/k/a Centennial Resource Development, Inc., Chesapeake Energy Corporation, Continental Resources Inc., Diamondback Energy, Inc., EOG Resources, Inc., Hess Corporation, Occidental Petroleum Corporation, and Pioneer Natural Resources Company (together, “Defendants”)¹, by and through their respective counsel and pending the Court’s approval, hereby stipulate as follows:

WHEREAS, Western Cab filed its Complaint against Defendants on February 28, 2024 (ECF No. 1);

WHEREAS, certain Defendants were served with the Complaint on March 7 and 8, 2024;

WHEREAS, the instant action was reassigned to this Court on March 7, 2024, on the basis that it “asserts substantially overlapping claims, names similar defendants, involves similar questions of fact, and shares a common question of law” as eight other actions² (the “Related Cases”) filed in this District, and accordingly is “related to the others filed in this district within the meaning of Local Rule 42-1” (ECF No. 9 at 1);

WHEREAS, on March 4, 2024, this Court conducted a hearing in the Related Cases concerning “whether venue is proper in Nevada and whether this Court may properly exercise personal jurisdiction over the Defendants.” Case No. 2:24-cv-00103, ECF Nos. 34, 147. During the hearing, Defendants informed the Court that they plan to file a motion to transfer venue, and the Court set a briefing schedule on that motion. Case No. 2:24-cv-00103, ECF No. 147. The

¹ By entering into this stipulation, none of the Defendants are waiving any of their potential defenses or arguments to this action, including but not limited to those related to personal jurisdiction and venue.

² The eight other related cases assigned to this Court are: *Rosenbaum et al. v. Permian Resources Corp. et al.*, No. 2:24-cv-00103-GMN-MDC; *Andrew Caplen Installations LLC et al. v. Permian Resources Corp. et al.*, No. 2:24-cv-00150-GMN-MDC; *These Paws Were Made for Walkin’ LLC v. Permian Resources Corp. et al.*, No. 2:24-cv-00164-GMN-MDC; *Courtmanche et al. v. Permian Resources Corp. et al.*, No. 2:24-cv-00198-GMN-MDC; *Mellor et al. v. Permian Resources Corp. et al.*, No. 2:24-cv-00253-GMN-MDC; *Santillo et al. v. Permian Resources Corp. et al.*, No. 2:24-cv-00279-GMN-MDC; *Beaumont et al. v. Permian Resources Corp. et al.*, No. 2:24-cv-00298-GMN-MDC; and *MacDowell et al. v. Permian Resources Corp. et al.*, No. 2:24-cv-00325-GMN-MDC.

1 Court ordered “that any answer or motion to dismiss shall be filed 21 days after an order on the
2 motion to transfer has been filed.” *Id.*

3 WHEREAS, Defendants intend to file a motion to transfer venue in the instant action
4 pursuant to the briefing schedule set by the Court in the Related Cases;

5 WHEREAS, good cause exists to suspend Defendants’ obligations to answer or otherwise
6 respond to the Complaint until 21 days after an order on Defendants’ forthcoming motion to
7 transfer has been filed. This is the first request related to the deadline for Defendants to respond
8 to the Complaint, and this request is not made for the purpose of delay.

9 NOW, THEREFORE, the parties have agreed, and respectfully submit for approval by the
10 Court the following:

- 11 1. The current deadline for Defendants to answer or otherwise respond to the
12 Complaint is suspended.
- 13 2. Defendants’ deadline to answer or otherwise respond to the Complaint shall be 21
14 days after the Court’s ruling on Defendants’ forthcoming motion to transfer venue
15 is filed.

16 **IT IS SO STIPULATED.**

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Dated: March 21, 2024

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IT IS SO ORDERED:

UNITED STATES DISTRICT JUDGE

Dated: 3-25-24